

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Criminal No. 1:16-CR-135-LO
v.)	
)	Honorable Liam O’Grady
AHMAD SAYED HASHIMI,)	
a/k/a “Jimmy”)	Trial: September 26, 2016
a/k/a “Jimmy Jimski”)	
a/k/a “Jamshaid”)	
)	
Defendant.)	

**UNITED STATES’ RESPONSE TO DEFENDANT’S MOTION FOR INSPECTION AND
DISCOVERY OF IMPEACHING INFORMATION**

COMES NOW the United States of America, by and through its counsel, Dana J. Boente, United States Attorney for the Eastern District of Virginia, Whitney Dougherty Russell, Assistant United States Attorney, and Sean Michael Welsh, Special Assistant United States Attorney, and responds to the defendant’s motion for inspection and discovery of impeaching information.

On June 22, 2016, a grand jury returned a four-count Indictment charging the defendant with: (1) one count of conspiracy to distribute oxycodone; (2) conspiracy to distribute cocaine; (3) kidnapping; and (4) interstate domestic violence. Dkt. No. 33. On June 24, 2016, this Court held an arraignment of the defendant where he pleaded not guilty to all charges. Dkt. No. 36. At the arraignment, the Court entered an agreed Discovery Order between the parties. Dkt. No. 37. Specifically, the Discovery Order requires the United States to produce all Giglio materials no later than five calendar days prior to trial for witnesses the government intends to call during its

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of September, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the defendant's attorney.

/s/

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